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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
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SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Melvin Woods,

Defendant.

CASE NO:

CR-19-00504-PHX-DWL (MHB)

INDICTMENT

VIO: 21 U.S.C. §§ 841(a)(1) and
(b)(1)(C)
(Distribution of a Controlled
Substance Resulting in Death and
Serious Bodily Injury)
Count 1

21 U.S.C. §§ 841(a)(1) and
(b)(1)(C)
(Distribution of a Controlled
Substance)
Counts 2 and 4

21 U.S.C. §§ 841(a)(1) and
(b)(1)(D)
(Distribution of a Controlled
Substance)
Count 3

18 U.S.C. § 981
21 U.S.C. §§ 853 and 881, and
28 U.S.C. § 2461(c)
(Forfeiture Allegations)

THE GRAND JURY CHARGES:

COUNT 1

On or about August 1, 2018, in the District of Arizona, the defendant, MELVIN WOODS, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide

(fentanyl), a Schedule II controlled substance, to G.H., whose death and serious bodily injury resulted from such substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 2

On or about August 7, 2018, at approximately 4:45 p.m., in the District of Arizona, the defendant, MELVIN WOODS, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

On or about August 7, 2018, at approximately 4:45 p.m., in the District of Arizona, the defendant, MELVIN WOODS, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

COUNT 4

On or about August 7, 2018, at approximately 7:15 p.m., in the District of Arizona, the defendant, MELVIN WOODS, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates the allegations of Counts 1 through 4 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to Title 18, United States Code, Section 981; Title 21, United States Code, Sections 853 and 881; and Title 28, United States Code, Section 2461(c), and upon conviction of the offense alleged in Counts 1 through 4 of this Indictment, the defendant

1 shall forfeit to the United States of America all right, title, and interest in (a) any property
2 constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as
3 the result of the offense, and (b) any of the defendants' property used, or intended to be
4 used, in any manner or part, to commit, or to facilitate the commission of such offense.,
5 including, but not limited to, the following property involved and used in the offense:

6 If any of the forfeitable property, as a result of any act or omission of the defendant:

7 (1) cannot be located upon the exercise of due diligence,

8 (2) has been transferred or sold to, or deposited with, a third party,

9 (3) has been placed beyond the jurisdiction of the court,

10 (4) has been substantially diminished in value, or

11 (5) has been commingled with other property which cannot be divided without
12 difficulty,

13 it is the intent of the United States to seek forfeiture of any other property of said defendant
14 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. Section
15 853(p).

16 All in accordance with Title 18, United States Code, Section 981, Title 21, United
17 States Code, Sections 853 and 881, Title 28, United States Code Section 2461(c), and Rule
18 32.2, Federal Rules of Criminal Procedure.

19
20 A TRUE BILL

21 s/
22 FOREPERSON OF THE GRAND JURY
Date: May 7, 2019

23 MICHAEL BAILEY
24 United States Attorney
District of Arizona

25 s/
26 D. J. PASHAYAN
Assistant U.S. Attorney